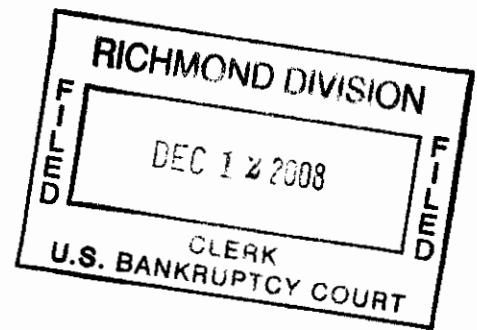


Frank T. Pepler, Esq.
PEPLER MASTROMONACO LLP
100 First Street, 25th Floor
San Francisco, California 94105
(415) 978-9860



Attorneys for Creditor
Morgan Hill Retail Venture, LP

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
CIRCUIT CITY STORES, INC., et : Case No. 08-35653
al. :
Debtors, : Jointly Administered
: :
: :
- - - - - x

CREDITOR MORGAN HILL RETAIL VENTURE, LP'S OBJECTION TO
CURE AMOUNTS

AS SET FORTH IN DEBTOR'S MOTION FOR ORDERS UNDER 11
U.S.C. §§ 105, 363, AND 365 (I) APPROVING BIDDING AND
AUCTION PROCEDURES FOR SALE OF UNEXPIRED NONRESIDENTIAL
REAL PROPERTY LEASES FOR CLOSING STORES, (II) SETTING
SALE HEARING DATE, AND (III) AUTHORIZING AND APPROVING
(A) SALE OF CERTAIN NON RESIDENTIAL REAL PROPERTY LEASES
FREE AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES, (B)
ASSUMPTION AND ASSIGNMENT OF CERTAIN UNEXPIRED LEASES,
AND (C) LEASE REJECTION PROCEDURES

1. Pursuant to Paragraph 13 of the Debtor's above referenced Motion and lease sale procedure order, Morgan Hill Retail Venture, LP, the landlord of Debtor's store 4229 located at 1007 Cochran Road, Morgan Hill, CA, pursuant to Lease Agreement dated September 6, 2007 objects to the Debtor's assertion of cure amount set forth in Exhibit B to its Motion as \$15,436, in the aggregate.

2. The true and correct cure amount as calculated by Morgan Hill Retail Venture, L.P. is \$137,638.65. A copy of the cure amounts, and the breakdown thereof, is attached hereto as Exhibit A.

Dated: December 10, 2008
San Francisco, California

PEPLER MASTROMONACO LLP


FRANK T. Pepler, Esq.
(CASP No. 10070)
100 First Street, 25th Floor
San Francisco, CA 94109
(415) 978-9860

Attorney for Creditor
Morgan Hill Retail Venture,
LP

CIRCUIT CITY
Morgan Hill, CA

1) Amounts Due through 12/10/08

| Description | % | Days | Amount |
|---|-----|------|---------------------|
| Rent From 11/1/08 through 11/30/08 | | 30 | 34,820.55 |
| CAM From 11/1/08 through 11/30/08 | | 30 | 5,133.25 |
| Property Taxes 4/4/08 - 06/30/09 | | | 36,684.86 |
| Estimated Supplemental Taxes 7/1/08-6/30/09 | | | 47,370.01 |
| Late Charge Penalty (10%) | 10% | | 12,430.87 |
| Interest From 11/1/08 through 12/10/08 | 6% | 40 | 899.11 |
| Total Amount Due | | | \$137,638.65 |

Note:

**** Interest Per Diem is \$22.48

EXHIBIT A

November 30, 2008
Morgan Hill Retail Venture LP
Circuit City - Morgan Hill, CA

| 728-37-063 07-08 Property Tax | | CAM Commence 4/4/2008 | Pro Rata Share of Total Bill | Total Due |
|----------------------------------|-----------|--------------------------|---------------------------------|---|
| Circuit City | 29,076.38 | 88 | 88/365=24.11% | \$ 7,010.32 |
| | | | | <u>4/4/08-6/30/08 Total Property Tax Due :</u> |
| | | | | <u>\$ 7,010.32</u> |

| 4/4/08-6/30/08 Total Property Tax Due : | | CAM Commence 4/4/2008 | Pro Rata Share of Total Bill | Total Due |
|---|-----------|--------------------------|---------------------------------|--|
| Circuit City | 29,674.54 | 365 | 100% | \$ 29,674.54 |
| | | | | <u>Total Property Tax Due :</u> |
| | | | | <u>\$ 29,674.54</u> |

| 728-37-063 08-09 Property Tax | | CAM Commence 4/4/2008 | Pro Rata Share of Total Bill | Total Due |
|----------------------------------|--|--------------------------|---------------------------------|---|
| | | | | <u>4/4/08-6/30/09 Total Amount Due :</u> |
| | | | | <u>\$ 36,684.86</u> |
| | | | | <1><2> |

4/4/08 - 6/30/09 Property Taxes Total Amount Due : \$ 36,684.86 <1><2>

SEE REVERSE FOR
PAYMENT INSTRUCTIONS

INSTALLMENT 2

2007-2008 DUE FEB. 1, 2008
728-37-063-00 PENALTY AFTER APR 10, 2008

SEE REVERSE FOR
PAYMENT INSTRUCTIONS

INSTALLMENT 1

2007-2008 DUE NOV. 1, 2007
728-37-063-00 PENALTY AFTER DEC 10, 2007

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PRIOR YR TAXES DELINQUENT 6/30/07
MORGAN HILL RETAIL VENTURE LP
JP DINAPOLI CO INC ATTN: EIRE STEWART
99 ALMADEN BL STE 565
SAN JOSE CA 95113

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3202400 F

PRIOR YR TAXES DELINQUENT 6/30/07
MORGAN HILL RETAIL VENTURE LP
JP DINAPOLI CO INC ATTN: EIRE STEWART
99 ALMADEN BL STE 565
SAN JOSE CA 95113

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DETACH HERE

MORGAN HILL RETAIL VENTURE LP
JP DINAPOLI CO INC ATTN: EIRE STEWART
99 ALMADEN BL STE 565
SAN JOSE CA 95113

COUNTY OF SANTA CLARA
SECURED PROPERTY TAX BILL

FISCAL YEAR 2007-08
(JULY 1, 2007 TO JUNE 30, 2008)

COUNTY GOVERNMENT CENTER, EAST WING
70 W. HEDDING ST., SAN JOSE, CA 95110-1267

WWW.SCTAX.ORG (408) 808-7900

DETACH HERE

TAXABLE AMT
12 MAXIMUM TAX LEVY 1.00
CO RETIREMENT LEVY .03

CO LIBRARY RETIREMENT .00
COMM COLLEGE BONDS .01

EDUCATION FUND BONDS .05

DT ASSESSED VAL RATE 1.11
SCVWD-STATE WATER PROJ .00

TOT LAND & IMPR RATE .00

820 SCVWD CLN SAFE CRKS \$25

847 SAN VITO CONDO 5

848 MOSQUITO ASMT #2 2

850 COUNTY LIBRARY 20

883 SCVWD FLOOD CONTR 11

990 OPENSPACE DISTRICTS 7

TOTAL SPECIAL ASSESSMENTS \$70

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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2008, a true and complete copy of the foregoing was filed by Federal Express and served by email and by facsimile to the parties set forth below:

Greg M. Galardi
Skadden, Arps, Slate, Meagher & Flom
One Rodney Square
P.O. Box 636
Wilmington, DE 19899-0636
ggreg.galardi@skadden.com
Fax: (888) 329-3792

Counsel for Debtors

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street
Second Floor
Richmond, VA 23219
ltavenner@tb-lawfirm.com
Fax: (804) 783-0178

Counsel for the Creditors Committee

Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad Street
Suite 4304
Richmond, VA 23219
Robert.b.van.arsdale@usdoj.gov
Fax: (804) 771-2330

Assistant United States Trustee

Dion W. Hayes
McGuire Woods, LLP
One James Center
901 East Cary Street
Richmond, VA 23219
dhayes@mcquierewoods.com
Fax: (804) 698-2078

Counsel for the Debtors

Robert J. Feinstein
Pachulski Stang Ziehl & Jones LLP
780 Third Avenue
36th Floor
New York, NY 10071
rfeinstein@pszjlaw.com
Fax: (212) 561-7777

Counsel for the Creditors Committee



Frank T. Pepler
California SB No. 100070
PEPLER MASTROMONACO LLP
100 First Street, 25th Floor
San Francisco, CA 94105
Tel: (415) 978-9860
Attorneys for Creditor
Morgan Hill Retail Venture, LP

Elizabeth Paul

From: Elizabeth Paul
Sent: Wednesday, December 10, 2008 1:00 PM
To: 'gregg.galardi@skadden.com'; 'dhayes@mcguirewoods.com'; 'ltavenner@tb-lawfirm.com'; 'reinstein@pszjlaw.com'; 'robert.b.van.arsdale@usdog.gov'
Cc: Frank Pepler
Subject: Circuit City
Attachments: Obj re cure amount (00464439).PDF

Frank Pepler asked me to send you the attached pleading. If you have any questions, please contact him directly at (415) 738-3336 or fpepler@peplermastromonaco.com. Thank you.

Elizabeth Paul

PeplerMastromonaco, LLP
100 FIRST STREET 25th FLOOR
SAN FRANCISCO, CALIFORNIA 94105
415.738.3353 Direct Dial
415.978.9860 Main
415.978.9862 Fax
epaul@peplermastromonaco.com
www.peplermastromonaco.com

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| ERROR | |

PeplerMastromonaco, LLP

FACSIMILE TRANSMISSION SHEET

| TO: | COMPANY: | FAX NUMBER: | PHONE NUMBER: |
|-------------------------------------|--------------------------------------|-----------------|---------------------------|
| Greg M. Galardi | Skadden, Arps, Slate, Meagher & Flom | (888) 329-3792 | |
| Dion W. Hayes | McGuire Woods, LLP | (804) 698-2078 | |
| Lynn L. Tavner | Tavner & Beran, PLC | (804) 783-0178 | |
| Robert J. Feinstein | Pachulski Stang Ziehl & Jones LLP | (212) 561-7777 | |
| Robert B. Van Arsdale | Office of the United States Trustee | (804) 771-2330 | |
| FROM: | Frank T. Pepler | SENDER'S PHONE: | (415) 978-9860 |
| | | SENDER'S FAX: | (415) 978-9862 |
| DATE: | December 10, 2008 | RE: | Circuit City Stores, Inc. |
| TOTAL PAGES INCLUDING COVER: | | 8 | |

Message/Comments:

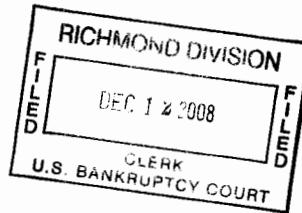
Pepler Mastromonaco LLP

FRANK T. PEPLER
DIRECT DIAL: 415.738.3336
fpepler@peplermastromonaco.com

December 10, 2008

VIA FEDERAL EXPRESS
Airbill No.: 7961 7646 4336

Clerk of the Court
United States Bankruptcy Court
Eastern District - Virginia
701 E Broad St Ste 4000
Richmond VA 232191849

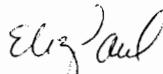


Re: In re Circuit City Stores, Inc.
Case No. 08-35653

Dear Clerk:

Enclosed please find the original and two copies of Creditor Morgan Hill Retail Venture, LP's Objection to Cure Amounts, etc. for filing. Please return a conformed copy to us in the enclosed self-addressed, stamped envelope. Thank you.

Very truly yours,


Elizabeth Paul
Assistant to Frank T. Pepler

FTP:e此
Enclosures